

Materials Considered by Lauren J. Stiroh, Ph.D.

Court Filing

William T. Whitman, Plaintiff, v. State Farm Life Insurance Company, Defendant, Case No. 3:19-cv-06025-BJR, United States District Court for the Western District of Washington at Tacoma:

Plaintiff's Motion for Class Certification, February 16, 2021

Second Amended Class Action Complaint, March 16, 2020

Elizabeth A. Bally, Plaintiff, v. State Farm Life Insurance Company, Defendant, Case No. 3:18-cv-04954-CRB, United States District Court for the Northern District of California:

Order Denying Motion to Strike and Granting Class Certification, April 2, 2020

Plaintiff Elizabeth Bally's (1) Notice of Motion and Motion for Class Certification; and (2) Memorandum of Points and Authorities in Support, March 27, 2020

State Farm's Supplemental Responses to Plaintiff's First Interrogatories, December 11, 2019

Order Denying Motion for Summary Judgment, August 19, 2019

Class Action Complaint, August 15, 2018

Michael G. Vogt, Plaintiff, v. State Farm Life Insurance Company, Defendant, Case No. 2:16-cv-04170-NKL, United States District Court, Western District of Missouri, Central Division:

Brief for the American Council of Life Insurers as *Amicus Curiae* in Support of Defendant-Appellant/Cross-Appellee State Farm Life Insurance Co., February 5, 2019

Transcript of Jury Trial, Volume IV, June 6, 2018

Transcript of Jury Trial, Volume III, June 5, 2018

Transcript of Jury Trial, Volume II, June 4, 2018

Order Granting Motion for Class Certification, April 20, 2018

Class Action Complaint, June 15, 2016

Expert Report

William T. Whitman, Plaintiff, v. State Farm Life Insurance Company, Defendant, Case No. 3:19-cv-06025-BJR, United States District Court for the Western District of Washington at Tacoma:

Expert Report of Scott J. Witt, February 16, 2021 and accompanying backup

Elizabeth A. Bally, Plaintiff, v. State Farm Life Insurance Company, Defendant, Case No. 3:18-cv-04954-CRB, United States District Court for the Northern District of California

Expert Report of David J. Weinsier, May 20, 2019

Declaration and Report of Scott J. Witt, June 20, 2019

Declaration and Report of Scott J. Witt, November 14, 2019 and accompanying backup

Declaration and Report of Rebecca Kirk Fair, February 3, 2020

Declaration and Report of Lauren J. Stiroh, February 3, 2020 and accompanying backup

Declaration and Report of Scott J. Witt, November 12, 2020 and accompanying backup

Declaration and Report of Lauren J. Stiroh, December 21, 2020 and accompanying backup

Rebuttal Declaration and Report of Scott J. Witt, January 20, 2021

Michael G. Vogt, Plaintiffs, v. State Farm Life Insurance Company, Defendant, Case No. 2:16-cv-04170-NKL, United States District Court, Western District of Missouri, Central Division:

Declaration and Report of Scott J. Witt, January 30, 2018 and accompanying backup

Supplemental Declaration and Report of Scott J. Witt, February 5, 2018 and accompanying backup

Expert Report of Anne Gron, March 2, 2018

Expert Report of David J. Weinsier, March 2, 2018

Declaration of Anne Gron, July 26, 2018

Declarations

William T. Whitman, Plaintiff, v. State Farm Life Insurance Company, Defendant, Case No. 3:19-cv-06025-BJR, United States District Court for the Western District of Washington at Tacoma:

Declaration of Tim Crabtree, March 26, 2021

Declaration of Amy Prestegaard, March 26, 2021

Declaration of Alan R. Hendren, March 27, 2021

Declaration of Nancy Pipinich, March 29, 2021

Declaration of Craig Reynolds, March 29, 2021

Declaration of Kerry Williams, March 29, 2021

Elizabeth A. Bally, Plaintiff, v. State Farm Life Insurance Company, Defendant, Case No. 3:18-cv-04954-CRB, United States District Court for the Northern District of California:

Declaration of Reg Dahlen, February 3, 2020

Declaration of Ross Lopez, February 3, 2020

Michael G. Vogt, Plaintiffs, v. State Farm Life Insurance Company, Defendant, Case No. 2:16-cv-04170-NKL, United States District Court, Western District of Missouri, Central Division:

Declaration of Carl Streily, December 11, 2017 and accompanying exhibits

Declaration of Jeffrey Holzbauer, February 28, 2018

Deposition

William T. Whitman, Plaintiff, v. State Farm Life Insurance Company, Defendant, Case No. 3:19-cv-06025-BJR, United States District Court for the Western District of Washington at Tacoma:

Deposition of William T. Whitman, March 1, 2021

Deposition of Scott Witt, March 18, 2021 and accompanying exhibits

Elizabeth A. Bally, Plaintiff, v. State Farm Life Insurance Company, Defendant, Case No. 3:18-cv-04954-CRB, United States District Court for the Northern District of California:

Deposition of Scott Witt, January 14, 2020 and accompanying exhibits

Deposition of Scott Witt, February 12, 2021 and accompanying exhibits

Michael G. Vogt, Plaintiffs, v. State Farm Life Insurance Company, Defendant, Case No. 2:16-cv-04170-NKL, United States District Court, Western District of Missouri, Central Division:

Deposition of Joseph Witte, Software Developer at State Farm, August 31, 2017

Deposition of Scott Witt, October 6, 2017

Deposition of Carl Raymond Streily, Jr., Pricing Area Director at State Farm, November 7, 2017

Deposition of Alan “Rusty” Hendren, Assistant Vice President in the Life Health Actuarial Department at State Farm, November 30, 2017

Deposition of Jeff Holzbauer, Director of the In-Force Product Management at State Farm, November 30, 2017

Deposition of Tony Phipps, Manager of the Experience Studies Unit at State Farm, December 8, 2017

Deposition of Scott Witt, February 22, 2018

Deposition of Scott Witt, Volume 3, May 30, 2018

Bates Stamped Document

PLTF-WHITMAN-00000001 – 852

SFLIC-000004293 – 315

SFLIC-000004317 – 325

SFLIC-000000154 – 168

SFLIC-000000257 – 270

SFLIC-000000631

SFLIC-000001568 – 572

SFLIC-000002378 – 382

SFLIC-000002556 – 558

SFLIC-000004033 – 096

SFLIC-000004448

SFLIC-000004449

SFLIC-000004450

SFLIC-000004451

SFLIC-000004735 – 755

SFLIC-000004774 – 782

SFLIC-000005298

SFLIC-W-0000207164

SFLIC-W-0000207165

SFLIC-W-0000207166

SFLIC-W-0000207168 – 271

SFLIC-W-0000207288 – 289

VOGTM00012352PROD

VOGTM00017532PROD-555

VOGTM00113257PROD-270

Data

State Farm Account History, SFLIC-W-000002-025

State Farm Policyholder Master Record, SFLIC-W-000001 and SFLIC-W-000026

Books

American Bar Association Section of Antitrust Law. *Econometrics: Legal, Practical, and Technical Issues* (Second Edition). 2014.

Allen, Mark A. and Victoria A. Lazaer, “Reference Guide on Estimation of Economic Damages,” in *Reference Manual on Scientific Evidence* (3rd Edition). Washington D.C.: National Academic Press, 2011.

Atkinson, David B. and James W. Dallas. *Life Insurance Products and Finance: Charting a Clear Course* (First Edition). Schaumburg, IL: Society of Actuaries, 2000.

Stiroh, Lauren J., “Proving Causation in Damage Analyses,” *Economics of Antitrust: Complex Issues in a Dynamic Economy*. Ed. Dr. Lawrence Wu. NERA Economic Consulting: White Plains, 2007.

Publicly Available Information

“Corporate Headquarters,” *State Farm Website*, available at <https://www.statefarm.com/about-us/company-overview/corporate-headquarters>, accessed November 21, 2019

“Enjoy flexible premiums and protection with universal life insurance,” *State Farm Website*, available at <https://www.statefarm.com/simple-insights/life-insurance/universal-life-insurance>, accessed January 15, 2020

“Fast Facts,” *State Farm Website*, available at <https://www.statefarm.com/about-us/company-overview/company-profile/fast-facts>, accessed November 21, 2019

“Flexible, Permanent Protection with Universal Life Insurance,” *State Farm Website*, available at <https://www.statefarm.com/insurance/life/universal-life>, accessed November 21, 2019

“Plan Ahead with Universal Life Insurance,” *State Farm Website*, available at <https://www.statefarm.com/insurance/life/universal-life/universal-life-insurance>, accessed December 17, 2019

“State Farm Companies,” *State Farm Website*, available at <https://www.statefarm.com/about-us/company-overview/company-profile/state-farm-companies>, accessed November 21, 2019

U.S. Code § 7702